

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALPHONSE MATTHEWS,)	
Plaintiff,)	
)	No. 07 C 6926
v.)	
)	JUDGE KENDALL
CITY OF CHICAGO, Chicago Police Officers)	
CALVIN CHATMAN, Star 5532,)	MAGISTRATE JUDGE KEYS
JAMES ECHOLS, Star 12329,)	
HARRY MATHEOS, Star 18599, and)	
DIMITRIOS LAMPERIS, Star 20718,)	
)	
Defendants.)	

**AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFFS' COMPLAINT**

Defendants, Chicago Police Officers Calvin Chatman, James Echols, Harry Matheos, and Dimitrios Lamperis (“Defendant Officers”), by their attorney, Gail L. Reich, Assistant Corporation Counsel, move this court for an extension of time to answer or otherwise plead in response to Plaintiff’s complaint until April 30, 2008, and in support state:

1. Plaintiff filed his six-count complaint on December 10, 2007. The complaint alleges

federal claims under 42 U.S.C. § 1983 against Defendant Officers, as well as Illinois state law

claims for Malicious Prosecution, and *Respondeat Superior* and statutory indemnification against

the City of Chicago.

2. Upon notice of the instant case, as in every case, Defendants’ attorney immediately

made the necessary requests for relevant documents in order to adequately respond to the

complaint, including ordering transcripts of all criminal proceedings in the underlying criminal

case.

3. While many documents have been procured, some of the most important documents, including transcripts from Plaintiffs' criminal trials, have yet to arrive. Although Defense counsel has had the opportunity to meet with her clients, the fact that they have not had the opportunity to review the testimony and evidence presented during the underlying criminal proceedings makes it nearly impossible to adequately respond to the Plaintiffs' allegations.

4. Plaintiff's counsel has agreed to this request for additional time to answer the complaint.

5. This is Defendant Officers' first request for an extension. This extension request is not made to delay the proceedings, but only to allow Defendant Officers an adequate opportunity to respond to the allegations in plaintiff's complaint. No prejudice will come to plaintiff as a result of this court granting Defendant Officers' motion.

WHEREFORE, Defendant Officers request this court to enter an order granting an extension to April 30, 2008, to answer or otherwise plead in response to Plaintiff's complaint.

Respectfully submitted,

GAIL L. REICH
/s/ Gail L. Reich
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